



U.S. Department of Energy  
**Office of River Protection**

0063103

P.O. Box 450, MSIN H6-60  
Richland, Washington 99352

NOV 08 2004

04-ED-095

Mr. Michael A. Wilson, Program Manager  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
3100 Port of Benton Blvd.  
Richland, Washington 99352

**RECEIVED**  
NOV 23 2004

**EDMC**

Dear Mr. Wilson:

SUBMITTAL OF PERMIT EQUIVALENCY NOTICE (PEN) NO. 24590-PTF-PEN-ENV-04-0005 FOR THE WASTE TREATMENT AND IMMOBILIZATION PLANT

Reference: WA7890008967, "Dangerous Waste Portion of the Hanford Facility Resource Conservation and Recovery Act Permit for the Treatment, Storage, and Disposal of Dangerous Waste, Chapter 10 and Attachment 51, 'Waste Treatment and Immobilization Plant.'"

This letter transmits PEN 24590-PTF-PEN-ENV-04-0005 (Attachment 1). The PEN is being provided in accordance with Section III.10.C.10.a of the referenced permit, which allows the use of equivalent or superior substitutions for items already specified in the permit without initiating a permit modification. The U.S. Department of Energy, Office of River Protection, and Bechtel National, Inc. certification statements are provided in Attachment 2.

The PEN describes an area increase to the Pretreatment Facility Room P-0307. This room is a waste management area that contains single walled dangerous waste piping associated with an auto sampler, and is identified on General Arrangement (GA) Plan 24590-PTF-P1-P01T-P0003, Revision 0. This GA Plan has been approved by the State of Washington Department of Ecology and is located in Attachment 51, Appendix 8.4 of the Reference. The revised area is expected to increase by approximately six percent which will not affect the construction process of the room. This permit equivalency was discussed in advance with your staff.

If you have any questions, please contact me, or your staff may contact Lori A. Huffman, Environmental Division, (509) 376-0104.

Sincerely,

  
Roy J. Schepens  
Manager

ED:LAH

Attachments: (2)

cc: See page 2

Mr. Michael A. Wilson  
04-ED-095

-2-

NOV 08 2004

cc w/attachs:

B. G. Erlandson, BNI  
J. P. Henschel, BNI  
R. E. Lawrence, BNI  
J. Markillie, BNI  
J. Cox, CTUIR  
S. Harris, CTUIR  
R. K. Biyani, Ecology  
S. L. Dahl, Ecology  
G. P. Davis, Ecology (w/o attachs)  
E. Fredenburg, Ecology  
R. Skinnarland, Ecology  
S. J. Skurla, Ecology  
S. A. Thompson, FHI  
P. Sobotta, NPT  
K. Niles, Oregon Energy (w/o attachs)  
J. B. Hebdon, RL (w/o attachs)  
A. C. McKarns, RL  
R. Jim, YN  
Administrative Record  
Environmental Portal, LMSI

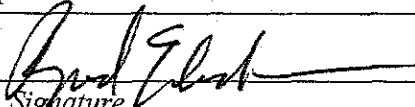
Attachment 1  
04-ED-095

Permit Equivalency Notice (24590-PTF-PEN-ENV-04-0005)



# Permit Equivalency Notice

Page 1 of 1

PDC Number:	24590-PTF-PEN-ENV-04-0005		
PEN Title:	Pretreatment Facility Room P-0307 Area Increase		
Date Prepared:	10/12/2004	Originator:	JE Lesser
<b>Source Document Driving Equivalency Determination (If Applicable)</b>			
Source Document Number	Rev	Source Document Name	
CCN 095199	-	Potential Changes to PT 56' Elevation	
<b>Affected Permit Information</b>			
Permit Number:	WTP Final Dangerous Waste Permit WA7890008967		Revision: 04/06
<b>Permit Equivalence Information</b>			
Specific Section(s)/Condition(s) Affected: Appendix 8.4: 24590-PTF-P1-P01T-P0003, Rev. 0, "Pretreatment Facility General Arrangement Plan at EL 56'-0"			
Description of Substitution/Equivalence: (Attach supplemental information)			
<p>Room P-307 is a gypsum walled room in the North West section of the Pretreatment facility above the four Waste Feed Receipt Process (FRP) Vessels. It is identified on the General Arrangement (GA) Plan 24590-PTF-P1-P01T-P0003, Rev. 0 as a waste management area that is expect to have single walled dangerous waste piping (the room has an auto sampler located in it). Secondary containment is provided by a floor slab with a coating material, a trench at the doorway, and a free flowing floor drain in the room. The approved +56 ft El. GA addressed in the dangerous waste permit, Attachment 51, Appendix 8.4, indicates that Room P-0307 has an area of roughly 711 ft<sup>2</sup>. Based on a recent model review, the addition of a small section will be proposed for the room. The revised area of that room is expected to be 756 ft<sup>2</sup>, an increase of 45 ft<sup>2</sup>, or approximately 6 %.</p> <p>The increased area will not affect the construction technique of pouring the flat slab over the FRP vessels. The new dimensions of Room P-0307 will affect the post installation of stud bolts to anchor the curb, which goes under walls, but it doesn't affect anything in the initial construction nor the floor drain as determined by the Mechanical System engineering.</p> <p>CCN 095199 (see Attachment 1 of this form) provides a discussion with the Washington State Department of Ecology and their initial concurrence associated with this equivalency notice.</p>			
<b>WTP Environmental Permits Lead Approval</b>			
Signer:	<u>Brad Erlandson</u> Print/Type Name	<u></u> Signature	<u>10/25/04</u> Date

Simmons, Cynthia M. (WTP)



From: Markillie, Jeff  
Sent: Wednesday, July 21, 2004 9:26 AM  
To: WTP PDC, Hendricks, Gerald D., Erlandson, Bradley; Dubiel, Barbara; Fahey, Susan; Robertson, Daniel (WTP); Hummer, Amy; Lesser, John; Sipkowski, John  
Subject: FW: Potential changes to PT 56' Elevation

CCN 095199

-----Original Message-----

From: Hendricks, Gerald D.  
Sent: Tuesday, July 20, 2004 5:28 PM  
To: Erlandson, Bradley; Markillie, Jeff  
Cc: Dubiel, Barbara; Fahey, Susan; Robertson, Daniel (WTP)  
Subject: FW: Potential changes to PT 56' Elevation

-----Original Message-----

From: Biyani, Rabindra [mailto:rbiy461@ECY.WA.GOV]  
Sent: Tuesday, July 20, 2004 4:44 PM  
To: Hendricks, Gerald D.  
Cc: Skurla, Steven; Fredenburg, Edward; Anderson-Moore, Michelle  
Subject: RE: Potential changes to PT 56' Elevation

Gerry,

I've reviewed the PT 56' GA submitted with Design Package PTF-064: Misc Unit Secondary Containment for PTF. There appears to be only regulated equipment (i.e. no misc unit) in the proposed expanded area adjacent to Room P-307. Therefore Ecology authorizes ORP/BNI to proceed with this change described below, without further documentation at this time. These and other similar changes will need to be recorded when as-built drawings are submitted.

Robbie  
372-7884

Best Available Copy

-----Original Message-----

From: Hendricks, Gerald D. [mailto:gdhendri@bechtel.com]  
Sent: Wednesday, July 14, 2004 2:11 PM  
To: Skurla, Steven; Fredenburg, Edward; Biyani, Rabindra; Anderson-Moore, Michelle  
Cc: Erlandson, Bradley; Markillie, Jeff; Smith, Roger E. (WTP); Berney, Cassandra K; McDowell, Joe L  
Subject: Potential changes to PT 56' Elevation

Steve, Ed, Michelle, & Robbie;

After our meeting on the 56' Filter Cave Room on 6-30, I discussed with you the potential for some likely changes to the 56' Elevation. In particular, this affects Room P-307 in the North West section above the 4 Pack Vessels.

Room P-307 is a gypsum walled room. It is identified as a waste management area that is expect to have single walled dangerous waste piping (the room has an auto sampler located in it). Containment is provided a coating material with a trench at the doorway and a free flowing floor drain in the room. When the 56' GA was submitted to you with the 56' Secondary Containment Package, that room had an area of roughly 711 ft<sup>2</sup>. Based on a recent model review, it appears it is being proposed to add a small section

to that room. I am told the revised area of that room is expected to be 756 ft2, an increase of 45 ft2, or roughly 6 %.

My concern is that I believe the schedule for reissuing the 56' GA is 8/17.

Once construction get the FRP 4-Pack Vessels placed, I believe they will be in a hurry to pour the cap over those westerly cells, likely in mid-September. This cell cap is also the 56' slab, although just a small portion of the slab will be poured at this time.

We have had conversations about what is significant (needing to be rectified before installation) and what is deemed as insignificant.

For the 56' slab, the construction technique will not change as they will pour a flat slab. The dimensions of Room P-307 will affect the post installation of stud bolts to anchor the curb which goes under walls, but it doesn't affect anything in the initial construction (I have had the Mechanical System folks take a quick look at the floor drain and their initial reaction is there will not be any change). We will reconfirm this before construction of course.

Is this a change I need to worry about processing prior to starting the cell caps/56' slab?

Appreciate any input you can give me.

Thanks  
Gerry


Attachment 2  
04-ED-095

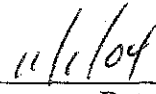
Bechtel National, Inc. and U.S. Department of Energy,  
Office of River Protection Certification Statements

## Bechtel National, Inc. Certification

The following certification statement is provided consistent with Contract No. DE-AC27-01RV14136, Section H.26, Environmental Permits, paragraph (g) for the submittal of the Hanford Tank Waste Treatment and Immobilization Plant - Permit Equivalency Notice 24590-PTF-PEN-ENV-04-0005.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

  
\_\_\_\_\_  
J. P. Henschel  
Project Director


  
\_\_\_\_\_  
Date




## U.S. Department of Energy, Office of River Protection Certification

The following certification statement is provided for the submittal of the Hanford Tank Waste Treatment and Immobilization Plant - Permit Equivalency Notice PEN-24590-PTF-PEN-ENV-04-0005.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Roy J. Schepens, Manager  
U.S. Department of Energy,  
Office of River Protection



Date